

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

U.S. DISTRICT COURT  
DISTRICT OF VERMONT

FILED

2005 DEC 5 AM 8 47

SIMONNE DODGE,

Plaintiff,

v.

LANDSTAR RANGER, INC.

Defendant.

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Case No.

2:05-cv-281

**FIRST AMENDED COMPLAINT  
PRELIMINARY STATEMENT**

1. This is a negligence action to recover damages for the negligent operation of a truck that resulted in severe injuries to the Plaintiff.

**PARTIES**

2. Simonne Dodge is a citizen of the State of Vermont.
3. Defendant Landstar Ranger, Inc., is a foreign corporation with a principal place of business outside of the state of Vermont. James C. Dodge, Sr. was the driver of the truck at issue.

**JURISDICTION**

4. This court has jurisdiction over this matter pursuant to 28 U.S.C. §1332(a)(2), diversity of citizenship, there being in excess of \$75,000 at issue, exclusive of interest and costs.

**FACTS**

5. On July 28, 2004, James C. Dodge, Sr., was operating a truck with trailer under contract to Defendant Landstar Ranger, Inc., delivering a load on behalf of Defendant.
6. James C. Dodge, Sr. was authorized to act and was an agent for Defendant in the operation of the truck.

**NEGLIGENCE**

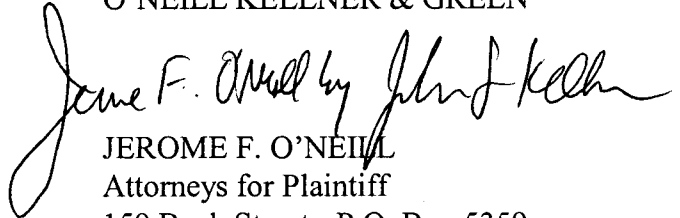
7. James C. Dodge, Sr. was negligent in the operation of the truck on July 28, 2004 in Raymond, Washington which proximately caused injuries to the plaintiff.
8. The negligence of James C. Dodge, Sr. in the operation of the truck while delivering the Landstar load is attributable to Defendant Landstar Ranger, Inc.

**DAMAGES**

9. Plaintiff has incurred medical bills exceeding \$700,000, lost income and incurred other expenses. She has suffered severe and permanent personal injuries as a result of the incident described in this complaint.

**WHEREFORE**, Plaintiff demands judgment against defendant in an amount in excess of \$75,000, the minimum jurisdictional amount of this Court, and such other relief as may be available to her.

O'NEILL KELLNER & GREEN

A handwritten signature in cursive script, appearing to read "Jerome F. O'Neill", is written over the printed name.

JEROME F. O'NEILL

Attorneys for Plaintiff

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December 2, 2005